

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

520 S. MICHIGAN AVENUE ASSOCIATES,)
LTD d/b/a THE CONGRESS PLAZA HOTEL)
& CONVENTION CENTER,)
)
Plaintiff,)
)
vs.) Case No. 10 CV 1395
)
UNITE HERE National Retirement Fund,) Judge Kennelly
)
Defendant.)

NOTICE OF MOTION

TO:	Ronald E. Richman Shannon Cade Schulte Roth & Zabel, LLP 919 Third Avenue New York, NY 10022	Michele M. Reynolds Kara R. Eisen Ronald M. Willis Dowd, Bloch & Bennett 8 S. Michigan Ave., 19 th Floor Chicago, IL 60603
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PLEASE TAKE NOTICE that on the **25th** day of **June, 2010** at 9:30, a.m., or as soon thereafter as counsel may be heard, we shall appear before the Honorable Matthew Kennelly, or any judge sitting in his stead in Room 2103 of the United States Court House, 219 South Dearborn Street, Chicago, Illinois, and shall then and there present the foregoing **PLAINTIFF'S MOTION FOR EXTENSION OF TIME**, a copy of which is submitted herewith.

Respectfully Submitted,
Congress Plaza Hotel & Convention Center

By: /s/ Bradley Wartman
One of its attorneys.

Bradley Wartman, Esq. Peter Andjelkovich, Esq. Peter Andjelkovich & Associates 39 South LaSalle Street, Suite 200 Chicago, IL 60603 312/782-8345	Alan Levy Lindner & Marsack 411 E. Wisconsin Ave Suite 1800 Milwaukee, WI 53202-4498 414-273-3910
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CERTIFICATE OF SERVICE

I, Bradley Wartman, an attorney, hereby certify that the above and foregoing **PLAINTIFF'S MOTION FOR EXTENSION OF TIME** was served upon all parties of counsel listed below by CM/ECF electronic transmission on this on this 14th day of June, 2010.

Ronald E. Richman
Shannon Cade
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By: _____ /s/Bradley Wartman _____